

Ropers Majeski Kohn & Bentley  
201 Spear Street, Suite 1000  
San Francisco, CA 94105  
Telephone: (415) 543-4800  
Facsimile: (415) 972-6301  
Email: [kstrickland@rmkb.com](mailto:kstrickland@rmkb.com)  
N. Kathleen Strickland, Esq. (*Pro Hac Vice Granted*)

Ropers Majeski Kohn & Bentley  
17 State Street, Suite 2400  
New York, NY 10004  
Telephone: (212) 668-5927  
Facsimile: (212) 668-5929  
Email: [gheineman@rmkb.com](mailto:gheineman@rmkb.com)  
Geoffrey W. Heineman, Esq.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	x	
	:	Chapter 11
In re	:	
	:	
	:	Case No. 09-50026(REG)
MOTORS LIQUIDATION COMPANY, et al.,	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
	:	
-----	x	

**CERTIFICATE OF NO OBJECTION FILED TO MOTION OF REMY  
INTERNATIONAL, INC. FOR AN ORDER EXTENDING AND ENFORCING THE  
STAY OR ALTERNATIVELY ENJOINING LITIGATION**

The undersigned hereby certifies that on September 16, 2009, copies of the following documents, filed in support of the Motion of Remy International, Inc. for an Order Extending and Enforcing the Stay Imposed under 11 U.S.C. § 362 (A) to Cover Certain Litigation Relating to Remy International, or Alternatively, Enjoining Such Litigation Pursuant to 11 U.S.C. § 105, (the "Remy Stay Motion") were served by overnight courier upon the entities on the attached service list, Exhibit A hereto, and by electronic mail on all parties receiving notice via the Court's ECF System:

NOTICE OF HEARING ON MOTION OF REMY INTERNATIONAL, INC. FOR AN ORDER  
EXTENDING AND ENFORCING THE STAY IMPOSED UNDER 11 U.S.C. § 362 (a) TO  
COVER CERTAIN LITIGATION RELATING TO REMY INTERNATIONAL, OR  
ALTERNATIVELY, ENJOINING SUCH LITIGATION PURSUANT TO 11 U.S.C. § 105

MOTION OF REMY INTERNATIONAL, INC. FOR AN ORDER EXTENDING AND  
ENFORCING THE STAY IMPOSED UNDER 11 U.S.C. § 362 (a) TO COVER CERTAIN  
LITIGATION RELATING TO REMY INTERNATIONAL, OR ALTERNATIVELY,  
ENJOINING SUCH LITIGATION PURSUANT TO 11 U.S.C. § 105

DECLARATION OF JEREMIAH SHIVES IN SUPPORT OF THE MOTION OF REMY  
INTERNATIONAL, INC. FOR AN ORDER EXTENDING THE AUTOMATIC STAY  
IMPOSED UNDER 11 USC §362(a) TO REMY INTERNATIONAL TO INCLUDE  
LITIGATION FILED AGAINST REMY INTERNATIONAL, OR ALTERNATIVELY  
ENJOINING SUCH LITIGATION PURSUANT TO 11 USC §105

ORDER GRANTING MOTION OF REMY INTERNATIONAL, INC. FOR AN ORDER  
EXTENDING AND ENFORCING THE STAY IMPOSED UNDER 11 U.S.C. § 362 (a) TO  
COVER CERTAIN LITIGATION RELATING TO REMY INTERNATIONAL, OR  
ALTERNATIVELY, ENJOINING SUCH LITIGATION PURSUANT TO 11 U.S.C. § 105

Based upon the October 6, 2009 hearing date and this Court's Order Pursuant to 11  
U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case  
Management Procedures, dated August 3, 2009, the Objection Deadline regarding the Remy Stay  
Motion was October 1, 2009 at 4:00 p.m. (prevailing Eastern Time). The undersigned hereby  
certifies that as of the Objection Deadline regarding the Remy Stay Motion, no opposition or  
request for a hearing has been timely filed or served upon the moving party. Additionally, no  
notice has been given by any of the served parties who are identified below, whether by letter,  
email or phone call, of any intent to oppose the Remy Stay Motion.<sup>1</sup>

Hence, the undersigned certifies that no objection to, or request for hearing regarding, the motion  
has been timely filed or served upon the moving party.

---

<sup>1</sup> In the *Phillips* case, the service packet of papers was returned because plaintiff's counsel, Linda George had moved to a new address. Service was re-effected on September 28, 2009 by email as well as by overnight delivery, with a request to contact counsel for Remy if Ms. George had any questions. Additionally, the court clerk's office in the *Phillips* case has informed my assistant Stephan Choo that the *Phillips* case has been stayed since 2004, is currently on the inactive docket and is expected to remain on the inactive docket at least for another six months. Defense counsel has informed me that this case is not likely to come off the stay for another couple of years at least.

Dated: October 1, 2009  
San Francisco, CA

Respectfully submitted,  
  
ROPERS, MAJESKI, KOHN & BENTLEY

By: /S/ N. KATHLEEN STRICKLAND  
\_\_\_\_\_  
N. KATHLEEN STRICKLAND, Esq.  
Ropers Majeski Kohn & Bentley  
201 Spear Street, Suite 1000  
San Francisco, CA 94105  
Telephone: (415) 543-4800  
Facsimile: (415) 972-6301  
Email: [kstrickland@rmkb.com](mailto:kstrickland@rmkb.com)

GEOFFREY W. HEINEMAN, Esq.  
Ropers Majeski Kohn & Bentley  
17 State Street, Suite 2400  
New York, NY 10004  
Telephone: (212) 668-5927  
Facsimile: (212) 668-5929  
Email: [gheineman@rmkb.com](mailto:gheineman@rmkb.com)

Attorneys for Creditor  
REMY INTERNATIONAL, INC.

**Exhibit A**

**SERVICE LIST**

The Debtors, c/o Motors Liquidation Company Attn: Ted Stenger 300 Renaissance Center Detroit, MI 48265	General Motors Corporation c/o Harvey R. Miller, Esq. Stephen Karotkin, Esq. Joseph H. Smolinsky, Esq. Wil, Gotchal & Manges, LLP 767 Fifth Avenue New York, NY 10153
General Motors Company Attn: Lawrence S. Buonomo, Esq. 300 Renaissance Center Detroit, MI 48265	U.S. Attorney's Office, S.D.N.Y. Attn: David S. Jones, Esq. Matthew L. Schwartz, Esq. 86 Chambers Street, Third Floor New York, New York 10007
The Debtors, c/o Motors Liquidation Company Attn: Warren Command Center Mailcode 480-206-114 Cadillac Building 30009 Van Dyke Avenue Warren MI 48090-9025	U.S. Treasury Attn: Joseph Samarias, Esq. 1500 Pennsylvania Avenue NW Room 2312 Washington, DC 20220
Cadwalader, Wickersham & Taft LLP Attn: John J. Rapisardi, Esq. One World Financial Center New York, NY 10281	Export Development Canada Vedder Price, P.C. Attn: Michael J. Edelman, Esq. Michael L. Schein, Esq. 1633 Broadway, 47 <sup>th</sup> Floor New York, NY 10019
Office of the U.S. Trustee of the SDNY Attn: Diana G. Adams, Esq. 33 Whitehall Street, 21 <sup>st</sup> Floor New York, NY 10004	Office Committee of Unsecured Creditors Attn: Thomas Moers Mayer Amy Caton Adam C. Rogoff, Gregory G. Plotki, Esq. Gordon Z. Novod, Esq. Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036

John F. Townsend, III Townsend & Townsend 230 East Ohio Street Indianapolis, IN 46204	Robert J. Sweeney Early, Ludwick & Sweeney, LLC 265 Church Street, 11 <sup>th</sup> Floor P.O. Box 1866 New Haven, CT 06508-1866
John A. Barnerd SIMMONS COOPERS LLC 707 Berkshire Boulevard East Alton, IL 64024	Linda George Laudig George Rutherford & Sipes 156 East Market Street, Suite 600 Indianapolis, IN 46204